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FORTRESS INVESTMENT GROUP LLC,
10 FORTRESS CREDIT CO. LLC,
VLSI TECHNOLOGY LLC
11

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 INTEL CORPORATION and APPLE INC.,

16 Plaintiffs,

17 v.

18 FORTRESS INVESTMENT GROUP LLC,
FORTRESS CREDIT CO. LLC, UNILOC
19 2017 LLC, UNILOC USA, INC., UNILOC
LUXEMBOURG S.A.R.L., VLSI
20 TECHNOLOGY LLC, INVT SPE LLC,
INVENTERGY GLOBAL, INC., and IXI IP,
21 LLC

22 Defendants.
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Case No. 3:19-cv-07651-EMC

**DECLARATION OF MICHAEL D.
HARBOUR IN SUPPORT OF
STIPULATION TO EXTEND
DEADLINES TO RESPOND TO THE
SECOND AMENDED COMPLAINT AND
SET BRIEFING SCHEDULE ON
RESPONSIVE MOTIONS**

I, Michael D. Harbour, declare as follows:

1. I am an attorney at law, admitted to practice in the United States District Court, Northern District of California, and I am a partner with the law firm of Irell & Manella LLP, counsel for defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, and VLSI Technology LLC in this matter. I have personal knowledge of each fact stated in this declaration, and, if called as a witness, I could and would competently and truthfully testify thereto.

2. I submit this declaration in support of the parties' Stipulation to Extend Deadlines to Respond to the Second Amended Complaint and Set Briefing Schedule on Responsive Motions.

3. Plaintiffs filed their second amended complaint ("SAC") on March 8, 2021. Dkt. No. 236.

4. Defendants' current deadline to respond to the SAC is March 22, 2021. Fed. R. Civ. P. 15(a)(3)

5. The parties have met and conferred over a stipulation to extend Defendants'¹ deadlines to respond to the SAC.

6. Defendants anticipate that they may respond to the SAC by way of motions to dismiss and strike, and the parties have agreed on a briefing schedule that will govern such motion practice, subject to Court approval.

7. Neither the parties' proposed extension of Defendants' deadlines to respond to the SAC nor the proposed briefing schedule set forth below will change or alter the date of any event or deadline already fixed by Court order

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on March 15, 2021, at Los Angeles, California.

By: /s/ Michael D. Harbour
Michael D. Harbour

¹ Fortress Investment Group LLC, Fortress Credit Co. LLC, Uniloc 2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.A.R.L., VLSI Technology LLC, INVT SPE LLL, Inventergy Global, Inc., and IXI IP, LLC